

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., individually, and  
on behalf of a Class of persons  
similarly situated,

*Plaintiff, and*

CITY OF SUMMERVILLE, GA.,

*Intervenor Plaintiff,*

v.

3M COMPANY, et al.

*Defendants.*

CIVIL ACTION FILE NO.:  
4:21-cv-00040-TWT

**CONSENT MOTION OF INTERVENOR PLAINTIFF CITY OF  
SUMMERVILLE, GEORGIA AND DEFENDANT 3M COMPANY TO  
EXTEND DATE FOR DISCOVERY RESPONSES**

Pursuant to Local Rule 7.4 and consistent with the Federal Rules of Civil Procedure 26 and 34, Intervenor Plaintiff City of Summerville, Georgia (“Summerville”) and Defendant 3M Company (“3M”) jointly move the Court to authorize an extension of time through and including Friday, September 23, 2022 for responses to outstanding discovery.

Counsel respectfully shows the Court that the existence of competing deadlines and the schedules of Counsel warrant the Court’s approval of the requested

extension and further show the Court that no pending deadlines of the Court's Scheduling Order [Dkt. 187] will be affected by approving the agreement of Counsel.

Upon approval of the Court, Summerville would be due to respond to 3M Company's First Request for Production to Intervenor-Plaintiff City of Summerville by Friday, September 23, 2022. A proposed order is submitted with this Consent Motion for the Court's consideration.

This 19<sup>th</sup> day of September, 2022.

/s/ Robert B. Remar

Robert B. Remar  
Georgia Bar No. 600575  
Monica P. Witte  
Georgia Bar No. 405952  
Katherine L. D'Ambrosio  
Georgia Bar No. 780128  
SMITH, GAMBRELL &  
RUSSELL, LLP  
1105 W. Peachtree St., NE  
Suite 1000  
Atlanta, GA 30309  
(404) 815-3500

/s/ W. Larkin Radney

W. Larkin Radney, *Pro Hac Vice*  
Benjamin P. Harmon  
Georgia Bar No. 979043  
Jackson R. Sharman, III  
Georgia Bar No. 637930  
Harlan I. Prater, *Pro Hac Vice*  
M. Christian King, *Pro Hac Vice*  
LIGHTFOOT, FRANKLIN, and  
WHITE LLC  
The Clark Building  
400 20<sup>th</sup> Street North  
Birmingham, AL 35203  
(205) 581-0700

*Attorneys for Defendant 3M Company*

/s/ J. Anderson Davis

J. Anderson Davis  
Georgia Bar No. 211077  
BRINSON, ASKEW, BERRY,  
SEIGLER, RICHARDSON  
& DAVIS, LLP  
P.O. BOX 5007  
Rome, GA 30162-5007  
(706) 291-8853

/s/ Jeffrey E. Friedman

Jeffrey E. Friedman, *Pro Hac Vice*  
Lee T. Patterson, *Pro Hac Vice*  
FRIEDMAN, DAZZIO,  
ZULANAS, P.C.  
3800 Corporate Woods Drive  
Birmingham, AL 35242  
(205) 278-7000

*Attorneys for City of Summerville,  
Georgia*

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the within and foregoing **Consent Motion of Intervenor Plaintiff City of Summerville, Georgia and Defendant 3M Company to Extend Date for Discovery Responses** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 19<sup>th</sup> day of September, 2022.

**BRINSON, ASKEW, BERRY, SEIGLER,  
RICHARDSON & DAVIS, LLP**

Post Office Box 5007  
Rome, GA 30162-5007  
Phone: (706) 291-8853  
Fax: (706) 234-3574  
[adavis@brinson-askew.com](mailto:adavis@brinson-askew.com)

/s/ J. Anderson Davis

J. ANDERSON DAVIS  
Georgia Bar. No 211077

*Attorney for City of Summerville,  
Georgia*